



# Asociación Interamericana de Hombres de Empresa

**CAPITULO DE SAN JUAN**

P.O Box 195630 San Juan, PR 00919

October 21, 2011

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Dear Chairman Genachowski:

The Inter American Businessmen Association was founded in 1961 by Hispanic business leaders with the goal of fostering an environment for economic growth and free market principles to solving our common problems. We continue to work with Hispanic leaders to grow new opportunities within the Hispanic community. We are headquartered in Puerto Rico with many chapters elsewhere, including in Miami. As president of this organization, I am writing to you with concerns about some of the elements of the Notice for Proposed Rulemaking, which considers new measures designed to thwart unauthorized charges on landline telephone bills.

Inter American Businessmen Association stands with you against cramming. However, some of the measures being considered in the NPRM would cause great harm to the Hispanic business community. We strongly disagree that third-party billing should be banned. As you can imagine, telecommunications and related services are crucial for Hispanic businesses. Third-party billing is equally essential, because it provides these businesses with the opportunity to reduce administrative costs by bundling these services onto one bill. This provides valuable savings, which they are then able to use to grow, hire, and ultimately expand. Eliminating third-party billing would cause the competitive nature and expansion of small businesses to deteriorate.

Hispanic-owned businesses are an important part of the United States' economy, and grew by nearly 44 percent between 2002 and 2007 – more than double the national growth rate of 18 percent. Hundreds of thousands of Hispanic households rely on third-party billing services because they enable these households to save money on telephone calls, Internet-related services, and other products. Eliminating third-party billing would make it more difficult for these businesses and households to buy, manage, and realize savings from these services.

Your efforts to fight cramming are commendable. However, elimination of third-party billing would create hardships across the Hispanic community. I urge you to please take the economic impact into consideration while addressing the issue of third-party billing, and to please keep in mind the benefits that third-party billing brings to small businesses and the entire Hispanic community.

Sincerely,

Ricardo Aponte Parsi, Esq.

President- Inter American Businessmen Association